

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

JRACKING (CHINA) STORAGE
SOLUTIONS d/b/a NANJING
JIANGRUI STORAGE EQUIPMENT
d/b/a NANJING JRACKING
INTERNATIONAL LTD.,

Plaintiff,

v.

U.S. STORAGE GROUP, LLC,

Defendant.

Case No. 3:16-cv-683

COMPLAINT

JRacking (China) Storage Solutions d/b/a Nanjing Jiangrui Storage Equipment d/b/a Nanjing JRacking International Ltd., (“JRacking”), by and through its attorney, alleges and states as follows:

1. Plaintiff JRacking is a Chinese corporation which maintains its principal place of business in Nanjing, Jiangsu Province, People’s Republic of China. JRacking does business as Nanjing Storage Equipment and as Nanjing JRacking International, Ltd. JRacking is a manufacturer of warehouse shelving and storage racks.

2. Defendant, U.S. Storage Group, LLC (“U.S. Storage”), is an Illinois corporation which maintains its principal place of business in Madison, Illinois. U.S. Storage is a distributor of warehouse shelving and storage racks.

3. This Court has jurisdiction over this matter pursuant to 28 U.S.C. § 1332(a)(2) because this matter is a suit between a subject of a foreign state and a citizen of Illinois and the amount in controversy exceeds \$75,000.00 exclusive of interest and costs.

4. Venue is proper in this Court pursuant to 28 U.S.C. § 1391(b)(1) and (2) in that the only defendant resides in this judicial district and a substantial part of the events or omissions giving rise to Cracking's claims occurred in this judicial district.

5. This court has personal jurisdiction over U.S. Storage in that, at all times relevant to this lawsuit, U.S. Storage has resided in and transacted business in this judicial district.

6. Beginning on or about April 19, 2012, U.S. Storage submitted multiple purchase orders to JRacking to purchase warehouse shelving and storage racks. U.S. Storage made changes to some of its orders after the purchase orders were submitted.

7. JRacking filled U.S. Storage's orders as amended by U.S. Storage. U.S. Storage did not make any complaints about the warehouse shelves and storage racks sold to it by JRacking.

8. U.S. Storage has paid \$263,706.28 toward the total amount due to JRacking. U.S. Storage currently owes JRacking \$311,136.51. See invoice attached hereto and incorporated herein by reference as Exhibit 1.

9. JRacking has demanded payment from U.S. Storage but U.S. Storage has failed and refuses to pay the amount due.

WHEREFORE, JRacking requests that this Court:

- A. Enter judgment in its favor against U.S. Storage;
- B. Award JRacking compensatory damages in the amount of \$311,136.51;
- C. Award JRacking its costs of suit; and
- D. Award JRacking such other relief as it finds just and equitable under all the circumstances.

CRISTOFER E. LORD

By /s/ Cristofer E. Lord (w/consent)

Cristofer E. Lord # 6183660
123 North Wacker Dr., Suite 250
Chicago, IL 60606
(312) 606-0035
(312) 332-1811 Fax
celord@lordlaw.net

- and -

MATHIS, MARIFIAN & RICHTER LTD.

By /s/ Mark S. Schuver

Mark S. Schuver, #6197656
Laura E. Schrick #6284750
23 Public Square, Suite 300
Belleville, Illinois 62220
(618) 234-9800
(618) 234-9786 Fax
mschuver@mmrltd.com
lschrick@mmrltd.com

Attorneys for Plaintiff